

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: MONICA BORJA , aka Monica Borja-Rubio, aka Monica Rubio Debtor	: : :	Chapter 13 Case No.: 19-13024-pmm
PARAMOUNT RESIDENTIAL MORTGAGE GROUP, Inc.,	: :	
v.	:	
Movant,	:	Motion for
	:	Relief from Stay
MONICA BORJA, ROGER G. BORJA , Co-Debtor and	:	
SCOTT F. WATERMAN, TRUSTEE,	:	
Respondents,	:	

**ANSWER TO MOTION OF
PARAMOUNT RESIDENTIAL MORTGAG GROUP FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **MONICA BORJA**, by and through their attorneys, FISHER CHRISTMAN, and in Answer to the Motion of **PARAMOUNT RESIDENTIAL MORTGAGE GROUP** for Relief from Stay aver:

1. Admitted.
2. Denied. Upon information and belief, Debtor owns all equitable interest in 913 Constitution Avenue, Pen Argyl, Northampton County, Pennsylvania (“the Property.”)
3. Denied to the extent the documents referenced do not speak for themselves.
4. Denied. Upon information and believe, the Trustee was appointed by the United States Trustee.
5. Denied to the extent the averments of paragraph 5 are other than a statement of conclusion of law or misplaced request for relief that does not require a response.
6. Denied. Debtor believed payments were made by a tenant under a temporary lease of her residence while she caring for a severely ill relative in New York. Debtor obtained a judgment against the tenant in November and holds an additional \$10,000 that can provide initial adequate protection pending a cure of arrears pursuant to a stipulation or adequate protection order.

7. Denied. Upon information and belief, applicable law does not allow recoupment of bankruptcy attorneys' fees from Debtor.

8. Denied. See response to paragraph 6, above.

9. Denied. Debtors' Plan payments are made via wage attachment and any arrears are due to delays associated with the wage attachment process.

10. Denied to the extent the averments of paragraph 10 are other than a statement of conclusion of law or misplaced request for relief that does not require a response. Movant may be entitled to an adequate protection order.

11. Denied to the extent the averments of paragraph 11 are other than a statement of conclusion of law or misplaced request for relief that does not require a response.

WHEREFORE, Debtor(s) **MONICA BORJA** respectfully pray(s) this Honorable Court for an Order than the Motion of **PARAMOUNT RESIDENTIAL MORTGAGE GROUP** for Relief from Stay be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

FISHER CHRISTMAN

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